

171 FERC ¶ 61,013  
UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Neil Chatterjee, Chairman;  
Richard Glick and Bernard L. McNamee.

PJM Interconnection, L.L.C.  
PJM Interconnection, L.L.C.

Docket Nos. ER15-1387-006  
ER15-1344-007

ORDER ACCEPTING COMPLIANCE FILINGS

(Issued April 3, 2020)

1. On August 30, 2019, the Commission issued an order (Order on Remand) rejecting the provisions of the PJM Interconnection, L.L.C. (PJM) Open Access Transmission Tariff (Tariff) implementing a proposal from the PJM Transmission Owners, under section 205 of the Federal Power Act (FPA),<sup>1</sup> to allocate 100% of the costs of projects that are included in the PJM Regional Transmission Expansion Plan (RTEP) solely to address individual transmission owner Form No. 715 local planning criteria to the transmission zone of the transmission owner whose Form No. 715 local planning criteria underlie each project (2015 PJM Transmission Owner Tariff Revision).<sup>2</sup> The Order on Remand responded to the U.S. Court of Appeals for the District of Columbia Circuit (D.C. Circuit) granting petitions for review and setting aside the Commission orders accepting the 2015 PJM Transmission Owner Transmission Revision and applying the Tariff provision to specific projects, and remanded to the Commission for further proceedings.<sup>3</sup> In the Order on Remand, the Commission required PJM to file

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<sup>1</sup> 16 U.S.C. § 824e (2018).

<sup>2</sup> *PJM Interconnection, L.L.C.* (Order on Remand), 168 FERC ¶ 61,133 (2019). The 2015 PJM Transmission Owner Tariff Revision was included in Schedule 12 of the PJM Tariff at § (b)(xv). PJM, Intra-PJM Tariffs, Schedule 12, OATT Schedule 12, 7.0.0, § (b)(xv) (Required Transmission Enhancements to Address Transmission Owner Planning Criteria).

<sup>3</sup> *Old Dominion Elec. Coop. v. FERC*, 898 F.3d 1254, *reh'g denied*, 905 F.3d 671 (D.C. Cir. 2018). The petitions for review challenged the order accepting the 2015 PJM Transmission Owner Tariff Revision in Docket No. ER15-1387, and orders applying the revised PJM Tariff to specific projects in Docket No. ER15-1344.

Tariff corrections necessary to reflect the rejection of the 2015 PJM Transmission Owner Tariff Revisions within the 30 days.

2. On September 27, 2019, in Docket No. ER15-1387-006, the PJM Transmission Owners submitted revisions to Schedule 12 of the PJM Tariff replacing the 2015 PJM Transmission Owner Tariff Revision with a provision stating “Reserved” (Schedule 12 Compliance Filing).<sup>4</sup> The PJM Transmission Owners request a May 25, 2015 effective date.

3. On October 29, 2019, in Docket No. ER15-1344-007, PJM submitted revised cost responsibility assignments for Schedule 12-Appendix A of the PJM Tariff for 44 transmission projects that were allocated pursuant to the 2015 PJM Transmission Owner Tariff Revision during the period from May 25, 2015 through August 30, 2019 (Cost Allocation Compliance Filing).<sup>5</sup>

4. In this order, we accept the Schedule 12 Compliance Filing and the Cost Allocation Compliance Filing.

## **I. Background**

5. PJM files cost responsibility assignments for transmission projects that the PJM Board of Managers (PJM Board) approves as part of PJM’s RTEP in accordance with Schedule 12 of PJM’s Tariff and Schedule 6 of the Operating Agreement.<sup>6</sup> Schedule 12 of the PJM Tariff establishes Transmission Enhancement Charges and allows that “[o]ne

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<sup>4</sup> PJM, Intra-PJM Tariffs, [Schedule 12, OATT Schedule 12, 7.1.0](#).

<sup>5</sup> See Appendix.

<sup>6</sup> In accordance with the Tariff and the Operating Agreement, PJM “shall file with FERC a report identifying the expansion or enhancement, its estimated cost, the entity or entities that will be responsible for constructing and owning or financing the project, and the market participants designated under Section 1.5.6(l) above to bear responsibility for the costs of the project.” PJM, Intra-PJM Tariffs, OA Schedule 6 Sec 1.6, OA Schedule 6 Sec 1.6 Approval of the Final Regional Trans, 4.0.0, § 1.6 (b). “Within thirty 30 days of the approval of each Regional Transmission Expansion Plan or an addition to such plan by the PJM Board pursuant to Section 1.6 of Schedule 6 of the PJM Operating Agreement, the Transmission Provider shall designate in the Schedule 12-Appendix A and in a report filed with the FERC the customers using Point-to-Point Transmission Service and/or Network Integration Transmission Service and Merchant Transmission Facility owners that will be subject to each such Transmission Enhancement Charge “Responsible Customers” based on the cost responsibility assignments determined pursuant to this Schedule 12.” *Id.*, Schedule 12, OATT Schedule 12, 14.0.0, § (b)(viii).

or more of the Transmission Owners may be designated to construct and own and/or finance Required Transmission Enhancements by (1) the [PJM RTEP] periodically developed pursuant to Operating Agreement, Schedule 6 or (2) any joint planning or coordination agreement between PJM and another region or transmission planning authority set forth in Tariff, Schedule 12-Appendix B.”<sup>7</sup>

6. In developing the RTEP, PJM identifies transmission projects to address different criteria,<sup>8</sup> including PJM planning procedures, North American Electric Reliability Corporation (NERC) Reliability Standards, Regional Entity reliability principles and standards,<sup>9</sup> and individual transmission owner Form No. 715 local planning criteria. Form No. 715 is the Annual Transmission Planning and Evaluation Report that any transmitting utility that operates integrated transmission facilities at or above 100 kV must file with the Commission on or before April 1 of each year.<sup>10</sup> As relevant here,

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<sup>7</sup> Required Transmission Enhancements are defined as “enhancements and expansions of the Transmission System that (1) a [RTEP] developed pursuant to Operating Agreement, Schedule 6 or (2) any joint planning or coordination agreement between PJM and another region or transmission planning authority set forth in Tariff, Schedule 12-Appendix B (“Appendix B Agreement”) designates one or more of the Transmission Owner(s) to construct and own or finance.” PJM, Intra-PJM Tariffs, OATT Definitions – R - S, OATT Definitions – R - S, 18.2.0. Transmission Enhancement Charges are established to recover the revenue requirement with respect to a Required Transmission Enhancement. *See id.*, Schedule 12, OATT Schedule 12, 14.0.0, § (a)(i).

<sup>8</sup> PJM identifies reliability transmission needs and economic constraints that result from the incorporation of public policy requirements into its sensitivity analyses and allocates the costs of the solutions to such transmission needs in accordance with the type of benefits that they provide. *See PJM Interconnection, L.L.C.*, 142 FERC ¶ 61,214 at P 441; PJM, Intra-PJM Tariffs, Schedule 12, OATT Schedule 12, 12.0.0, § (b)(v) (Economic Projects) (assigning cost responsibility for Economic Projects that are either accelerations or modifications of Reliability Projects, or new enhancements or expansions that relieve one or more economic constraints); *Id.*, OA Schedule 6 Sec 1.5, OA Schedule 6 Sec 1.5 Procedure for Development of the Regi, 23.0.0, § 1.5.7(b)(iii).

<sup>9</sup> As established by Reliability First Corporation, Southeastern Electric Reliability Council, and other applicable Regional Entities. *See* PJM, Intra-PJM Tariffs, OA Schedule 6 Sec 1.2, OA Schedule 6 Sec 1.2 Conformity with NERC and Other Applic, 2.0.0, §§ 1.2(b) and 1.2(d) (Conformity with NERC and Other Applicable Reliability Criteria) (2.0.0).

<sup>10</sup> *See* 18 C.F.R. § 141.300 (2019).

Form No. 715 requires submission of transmission planning reliability criteria that the transmission owner uses to assess and test the strength and limits of its transmission system.

7. Types of Reliability Projects<sup>11</sup> identified in the RTEP include Regional Facilities,<sup>12</sup> Necessary Lower Voltage Facilities,<sup>13</sup> and Lower Voltage Facilities.<sup>14</sup> PJM assigns the costs of Reliability Projects that are selected in the RTEP for purposes of cost allocation pursuant to the cost allocation method that the Commission accepted in compliance with Order No. 1000.<sup>15</sup> Specifically, in the case of Regional Facilities and Necessary Lower Voltage Facilities that address a reliability need, costs are allocated pursuant to a hybrid cost allocation method in which 50% of the costs of those facilities are allocated on a load-ratio share basis and the other 50% are allocated to the transmission owner zones based on the solution-based distribution factor (DFAX)

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<sup>11</sup> Reliability Projects are Required Transmission Enhancements that are included in the RTEP to address one or more reliability violations or to address operational adequacy and performance issues. PJM, Intra-PJM Tariffs, Schedule 12, OATT Schedule 12, 14.0.0, § (b)(i)(A)(2)(a).

<sup>12</sup> Regional Facilities are defined as Required Transmission Enhancements included in the RTEP that are transmission facilities that: (a) are AC facilities that operate at or above 500 kV; (b) are double-circuit AC facilities that operate at or above 345 kV; (c) are AC or DC shunt reactive resources connected to a facility from (a) or (b); or (d) are DC facilities that meet the necessary criteria as described in section (b)(i)(D). *Id.*, § (b)(i) (Regional Facilities and Necessary Lower Voltage Facilities).

<sup>13</sup> Necessary Lower Voltage Facilities are defined as Required Transmission Enhancements included in the RTEP that are lower voltage facilities that must be constructed or reinforced to support new Regional Facilities. *Id.*, § (b)(i) (Regional Facilities and Necessary Lower Voltage Facilities).

<sup>14</sup> Lower Voltage Facilities are defined as Required Transmission Enhancements that: (a) are not Regional Facilities; and (b) are not “Necessary Lower Voltage Facilities.” *Id.*, § (b)(ii) (Lower Voltage Facilities).

<sup>15</sup> See *Transmission Planning & Cost Allocation by Transmission Owning & Operating Pub. Utils.*, Order No. 1000, 136 FERC ¶ 61,051 (2011), *order on reh’g*, Order No. 1000-A, 139 FERC ¶ 61,132, *order on reh’g & clarification*, Order No. 1000-B, 141 FERC ¶ 61,044 (2012), *aff’d sub nom. S.C. Pub. Serv. Auth. v. FERC*, 762 F.3d 41 (D.C. Cir. 2014); see also *PJM Interconnection, L.L.C.*, 142 FERC ¶ 61,214 (2013), *order on reh’g & compliance*, 147 FERC ¶ 61,128 (2014), *order on reh’g & compliance*, 150 FERC ¶ 61,038, *order on reh’g & compliance*, 151 FERC ¶ 61,250 (2015).

method.<sup>16</sup> Pursuant to the cost allocation method that the Commission accepted in compliance with Order No. 1000, all of the costs of Lower Voltage Facilities were allocated using the solution-based DFAX method.

8. On February 12, 2016, the Commission accepted the 2015 PJM Transmission Owner Tariff Revision to allocate 100% of the costs for Required Transmission Enhancements that are included in the RTEP solely to address individual transmission owner Form No. 715 local planning criteria to the zone of the individual transmission owner whose Form No. 715 local planning criteria underlie each project.<sup>17</sup>

9. As previously noted, on August 3, 2018, the D.C. Circuit granted petitions for review and set aside the Commission orders accepting the 2015 PJM Transmission Owner Transmission Revision and remanded the case to the Commission for further proceedings.<sup>18</sup> On August 30, 2019, the Commission issued the Order on Remand rejecting the 2015 PJM Transmission Owner Tariff Revision.

## **II. Order on Remand**

10. In the Order on Remand, the Commission rejected the 2015 PJM Transmission Owner Tariff Revision. The Commission directed PJM, within 30 days of the date of the Order on Remand, to make a filing in eTariff to make all tariff corrections necessary to reflect the rejection of the 2015 PJM Transmission Owner Tariff Revision.<sup>19</sup> The Commission also directed PJM to refile the cost responsibility assignments in Schedule 12-Appendix A, of the PJM Tariff for transmission projects included in the RTEP

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<sup>16</sup> “The solution-based DFAX method evaluates the projected relative use on the new Reliability Project by the load in each zone and withdrawals by merchant transmission facilities, and through this power flow analysis, identifies projected benefits for individual entities in relation to power flows.” *PJM Interconnection, L.L.C.*, 142 FERC ¶ 61,214 at P 416.

<sup>17</sup> *PJM Interconnection, L.L.C.*, (February 2016 Order) 154 FERC ¶ 61,096 (2016) (granting rehearing and accepting the 2015 PJM Transmission Owner Tariff Revision), *order on reh’g*, 157 FERC ¶ 61,192.

<sup>18</sup> The D.C. Circuit set aside the orders under review to the extent they applied the 2015 PJM Transmission Owner Tariff Revision to the projects at issue. *Old Dominion*, 898 F.3d at 1264.

<sup>19</sup> On September 19, 2019, the Commission granted a PJM motion requesting a 30-day extension of time until October 29, 2019 to file the revised cost responsibility assignments.

between May 25, 2015, and the date of this order that are needed solely to address individual transmission owner Form No. 715 local planning criteria.

### **III. Compliance Filings**

#### **A. Schedule 12 Compliance Filing**

11. In the Order on Remand, the Commission rejected the 2015 PJM Transmission Owner Tariff Revision and directed PJM to, within 30 days of the date of the order, make a filing in eTariff to make all tariff corrections necessary to reflect the rejection of the 2015 PJM Transmission Owner Tariff Revision. Instead of deleting the provision, the PJM Transmission Owners propose to replace the 2015 PJM Transmission Owner Tariff Revision with a provision stating “Reserved”.<sup>20</sup>

#### **B. Cost Allocation Compliance Filing**

12. PJM explains that it reviewed the cost responsibility assignments for 443 transmission projects that had been assigned 100% to the zone of the transmission owner who filed the Form No. 715 planning criteria, during the period of May 25, 2015 through August 30, 2019, and determined that revisions to cost responsibility assignments were needed for only 44 transmission projects (Remand Projects). PJM explains the majority of transmission facilities needed solely to address individual transmission owner Form No. 715 local planning criteria continue to be allocated to a single transmission owner zone.<sup>21</sup>

13. Of the 44 Remand Projects, PJM explains the cost allocation will be revised for 11 Regional Facilities and 33 Lower Voltage Facilities. PJM explains the cost allocation for the Regional Facilities will be based on PJM’s hybrid cost allocation method, with 50% of the costs of the transmission projects allocated on a load-ratio share basis and the other 50% based on the solution-based DFAX method. PJM explains the cost allocation for the Lower Voltage Facilities will be based on the cost allocation methodology in Schedule 12 of the PJM Tariff which is the solution-based DFAX method.<sup>22</sup> PJM also

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<sup>20</sup> PJM, Intra-PJM Tariffs, Schedule 12, OATT Schedule 12, 7.1.0, § (b)(xv) (Reserved).

<sup>21</sup> PJM, Intra-PJM Tariffs, Schedule 12, OATT Schedule 12, 14.0.0, §§ (b)(iii) – (iv), (b)(xvi).

<sup>22</sup> PJM Transmittal at 5.

states that one Regional Facility and five Lower Voltage Facilities required sub identification numbers be created to accommodate the Order on Remand.<sup>23</sup>

#### **IV. Notice, Intervention and Responsive Pleadings**

##### **A. Schedule 12 Compliance Filing**

14. Notice of the Schedule 12 Compliance Filing was published in the *Federal Register* 84 Fed. Reg. 54,879 (Oct. 11, 2019). Interventions were due on or before October 18, 2019. Notice of intervention was submitted by New Jersey Board of Public Utilities (New Jersey Board). Out of time motions to intervene were submitted by Southern Maryland Electric Cooperative, Inc. (SMECO) and East Kentucky Power Cooperative, Inc. (EKPC). No protests or comments were submitted.

##### **B. Cost Allocation Compliance Filing**

15. Notice of the Cost Allocation Compliance Filing was published in the *Federal Register* 84 Fed. Reg. 59,797 (Nov. 6, 2019). The Commission granted a request by Long Island Power Authority (LIPA) and Neptune Regional Transmission System, LLC (Neptune) to extend the comment period to December 3, 2019. Notices of intervention were filed by the New Jersey Board, and the Illinois Commerce Commission (Illinois Commission). Timely motions to intervene were filed by LIPA, Neptune, SMECO, Delaware Municipal Electric Corporation, Inc., EKPC, LSP Transmission Holdings II, LLC (LSP Transmission), and Duquesne Light Company (Duquesne). Old Dominion Electric Cooperative (ODEC), Dominion Energy Services, Inc. on behalf of Virginia Electric Power Company (Dominion), PPL Electric Utilities Corporation (PPL), Dayton Power and Light Company (Dayton), American Municipal Power (AMP) and Linden VFT, LLC (Linden) submitted timely motions in the underlying docket to this proceeding. AMP, LSP Transmission, and ODEC collectively filed an out of time motion to intervene and an answer as the PJM Industrial Customer Coalition (Industrial Customer Coalition).

16. Protests of the Cost Allocation Compliance Filing were submitted by ODEC and Dominion, Neptune, LIPA, PPL, and Dayton, Illinois Commission, and Duquesne.

17. PJM filed an answer to the protests of LIPA, Neptune, PPL, Dayton, and Duquesne. Linden filed an answer opposing the protest of ODEC and Dominion. EKPC submitted an answer supporting the protest of PPL and Dayton. The Industrial Customer Coalition, ODEC and Dominion, and Neptune submitted an answer opposing the protest of PPL and Dayton. ODEC and Dominion filed an answer to the answer of Linden.

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<sup>23</sup> The Regional Facility b2960 includes b2960.1 and b2960.2. The five Lower Voltage Facilities include: b2835, b2836, b2837, b2933 and b2986. *Id.* at 5.

LIPA and Neptune filed answers to the answer of PJM. Linden, and PPL and Dayton filed answers to the answer of ODEC and Dominion. LIPA filed an answer to the answer of Neptune. ODEC and Dominion, and AMP filed answers to the answer of PPL and Dayton. PPL and Dayton filed an answer to the answer of ODEC and Dominion.

## **V. Pleadings**

### **A. Cost Allocation Compliance Filing**

#### **1. Cost Allocation of Remand Projects**

##### **a. Metuchen-Trenton-Burlington Project and Front Street-Springfield Project**

18. LIPA and Neptune argue that the revised cost responsibility assignments for PSEG projects b2836 and b2837, the Metuchen-Trenton-Burlington Project (MTB Project), and b2933.31, the Front Street-Springfield Project (Springfield Project), in the Cost Allocation Compliance Filing are not commensurate with the benefits received by those parties allocated costs, and cannot be based on the usage of the facilities.<sup>24</sup> Neptune specifically argues that the costs of these projects are not commensurate with benefits because 100% of the costs are allocated to Neptune, despite the facts that the projects are: 1) located within PSEG's zone; 2) serve multiple PSEG load substations; 3) driven by PSEG's end of life criteria; and 4) located multiple zones away from the Neptune.<sup>25</sup> LIPA argues that the benefits of the MTB Project only pertain to PSEG's load, and the majority of the projects involve substations serving PSEG load or the replacement of a transmission line that only provides distribution service in the PSEG zone.<sup>26</sup>

19. LIPA and Neptune also argue PJM has not met its burden under section 205 to demonstrate that the filing is just and reasonable. LIPA argues that the Cost Allocation Compliance Filing lacks "substantial evidence,"<sup>27</sup> including supporting information such

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<sup>24</sup> LIPA represents the costs of project b2836 and b2837 is \$302 million and \$312 million, respectively. Neptune Protest at 9-12, LIPA Protest at 2-3, 11-13, 17.

<sup>25</sup> Neptune Protest at 4-6, 12-13, Neptune Answer at 1-3, 9-10, 12-13, 17-19 (Jan. 14, 2020).

<sup>26</sup> LIPA Protest at 12.

<sup>27</sup> *Id.* at 3, 7, (citing 5 U.S.C. § 706(2)(E) (2012); *Motor Vehicles Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43-44 (1983); *S.C. Pub. Serv. Auth. v. FERC*, 762 F.3d 41, 54 (D.C. Cir. 2014)).



as the purpose for the subdivision of projects, disaggregate costs per subproject, actual flows and usage by subproject.<sup>28</sup> Neptune states PJM has not explained the effect of separating projects into subprojects on the cost responsibility assignments, nor did it provide any calculation or other explanation to explain the proposed cost reallocations.<sup>29</sup> Neptune argues this lack of information does not allow intervenors to review or confirm the proposed cost responsibility assignments.<sup>30</sup>

20. Neptune and LIPA argue that the MTB Project and Springfield Project should not be included in regional cost allocation because they are needed only to address PSEG end of life criteria and have not been identified by PJM as addressing a reliability contingency.<sup>31</sup> Neptune states the solution-based DFAX method has not produced a just and reasonable rate for the MTB Project and the Springfield Project because they are driven by non-flow based criteria, and the Commission should direct PJM to establish a different cost allocation as it has in other proceedings.<sup>32</sup> LIPA and Neptune request that the Commission set the matter for hearing, and Neptune requests that the Commission set the impact of the *de minimis* threshold to the MTB Project cost responsibility assignments for hearing as well.<sup>33</sup>

21. In response, PJM explains that when initially designating the cost responsibility assignments for the MTB Project, it did not create subprojects because the project was allocated 100% to the transmission owner zone and subprojects were not needed.<sup>34</sup> As to Neptune's arguments that the MTB Project cost responsibility assignments are not commensurate with benefits, PJM argues that it follows the solution-based DFAX

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<sup>28</sup> *Id.* at 6, LIPA Answer at 5 (Jan. 2, 2020).

<sup>29</sup> Neptune Protest at 6-9, 16, Neptune Answer at 5, 11-12, 14-18 (Jan. 14, 2020).

<sup>30</sup> Neptune Protest at 9.

<sup>31</sup> *Id.* at 13; Neptune Answer at 12-13 (Jan. 14, 2020).

<sup>32</sup> Neptune argues the cost responsibility assignments are unjust and unreasonable, similar to the cost responsibility assignments of the Artificial Island Project. *Id.* at 19 - 21, Neptune Answer at 17-19 (January 14, 2020) (citing *Del. Pub. Serv. Comm'n v. PJM Interconnection, L.L.C.*, 166 FERC ¶ 61,161 (2019)).

<sup>33</sup> Neptune argues that the use of the *de minimis* assumption used in the solution-based DFAX method distorts cost responsibility assignments by shifting costs from large transmission zones to smaller transmission zones. *Id.* at 21 -22, LIPA Protest at 3.

<sup>34</sup> PJM Answer at 5-6 (Dec. 18, 2019).

method established in its Tariff.<sup>35</sup> PJM provides a table outlining the DFAX data used to establish cost responsibility allocations for the MTB Project. PJM explains that the table includes the applicable directional usage, the DFAX and the peak load information used to develop the 2019 cost allocations for the MTB Project which were used in the calculations for its cost responsibility assignments under Schedule 12 of the PJM Tariff.<sup>36</sup> PJM explains that it does not have discretion over the formulaic cost allocation method, which is based on a computer model of its electricity network that evaluates the relative use of a new facility.<sup>37</sup>

22. In its answers, Neptune reiterates that the revised cost responsibility assignments to Neptune for the MTB Project and Springfield do not meet cost causation principles established in the courts.<sup>38</sup> Neptune also argues the DFAX percentages are misleading because they imply that Neptune and PSEG have the same MW usage of the facilities comprising the MTB Project, but they do not and this is not reflected in the data.<sup>39</sup> Neptune provides a table using the data provided by PJM demonstrating that its relative use of these subprojects is the lowest of any PJM zone, and far lower than PSEG, Jersey Central Power & Light and PECO zones.<sup>40</sup> LIPA states that PJM's flow calculations vary significantly, demonstrating that the DFAX results produce a disparate allocation of costs for newly created subprojects for the PSEG zone. LIPA argues that PJM cites to no Tariff language that directs how a subdivision of a transmission project should occur, and does not explain how it approached the subdivision of transmission facilities needed solely to address individual transmission owner Form No. 715 local planning criteria.<sup>41</sup>

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<sup>35</sup> *Id.* at 7-9 (citing PJM, Intra-PJM Tariffs, Schedule 12, OATT Schedule 12, 14.0.0, § (b)(iii)).

<sup>36</sup> *Id.* at 7-8.

<sup>37</sup> *Id.* at 8-9.

<sup>38</sup> Neptune Answer at 3, (Dec. 26, 2019) (citing *Old Dominion*, 905 F.3d 671 and *Ill. Commerce Comm'n v. FERC*, 756 F.3d 470 (7th Cir. 2009)); Neptune Answer at 16-18 (Jan. 14, 2020).

<sup>39</sup> Neptune Answer at 1-3 (Dec. 26, 2019). LIPA argues the relative megawatt flows to PSEG and JCPL zones for the MTB Project are five to ten times greater than the megawatt flows to Neptune, which are 10 MW or less. LIPA Answer at 3-6 (Jan. 2, 2020).

<sup>40</sup> Neptune Answer at 3-7, 9-10 (Dec. 26, 2019).

<sup>41</sup> LIPA Answer at 3-6 (Jan. 2, 2020).

**b. Other Remand Projects**

23. Several parties argue that as a general matter, transmission facilities needed solely to address individual transmission owner Form No. 715 local planning criteria are asset management projects that only benefit the transmission owner building the facility,<sup>42</sup> not other transmission owner zones, and are distinct from regionally planned transmission facilities.<sup>43</sup> The Illinois Commission argues that the revised cost responsibility assignments for the 11 Regional Facilities included as Remand Projects are unjust and unreasonable because the revisions will cause inequitable cost shifts that fail to account for the “burdens imposed”<sup>44</sup> to other transmission zones. PPL and Dayton argue that PJM failed to apply Schedule 12, section (b)(xiii) to allocate the costs of the Remand Projects,<sup>45</sup> given that the replacement of transmission facilities at the end of their useful life is the responsibility of transmission owners and their loads, and this provision requires the costs of transmission projects addressing the replacement of equipment to be assigned to the transmission owner zones or merchant facilities responsible for the replacement facilities. PPL and Dayton further state that the filing of Form No. 715 local transmission criteria by transmission owners cannot change this allocation.<sup>46</sup> PPL and Dayton also argue that *Old Dominion* does not address whether only high voltage Regional Facilities needed solely to address individual transmission owner Form No. 715 local planning criteria should be included in RTEP, or whether transmission facilities

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<sup>42</sup> Duquesne Protest at 2-4, EKPC Answer at 1-3. PPL and Dayton Protest at 15-19, 24 (citing *PJM Interconnection, L.L.C.*, 119 FERC ¶ 61,063 at PP 48–56 (2007) (Opinion No. 494), *reh’g denied*, 122 FERC ¶ 61,082 (2008) (Opinion No. 494-A), *rev’d on other grounds*, *Ill. Commerce Comm’n v. FERC*, 576 F.3d 470, 473-474, 476, and PJM, Rate Schedules, TOA, TOA-42 Rate Schedule FERC No. 42, 1.0.0, § 4.1.4, 6.3.3, 6.3.4).

<sup>43</sup> PPL and Dayton argue PJM’s transmission owners both retained responsibility for these projects and are obligated to maintain them under the PJM Consolidated Transmission Owner Agreement. PPL and Dayton Protest at 15-18.

<sup>44</sup> Illinois Commission states that Dominion will pay 13.87%, or \$50.47 million of the costs for the 11 Regional Facilities, shifting \$332 million to other transmission owner zones. Illinois Commission argues that the Commonwealth Edison Company will receive \$50.74 million in costs, in which no commensurate benefit to Illinois has been shown. Illinois Commission Protest at 4, (citing *Ill. Commerce Comm’n v. FERC*, 576 F.3d 470, 476).

<sup>45</sup> PPL and Dayton Protest at 2-3 (citing PJM, Intra-PJM Tariffs, Schedule 12, OATT Schedule 12, 14.0.0, § (b)(xiii)).

<sup>46</sup> *Id.* at 2-3, 9-10; PPL and Dayton Answer, at 8-10 (Jan. 2, 2020).

needed solely to address individual transmission owner Form No. 715 local planning criteria that do not expand or enhance the transmission system actually address regional needs.<sup>47</sup> Neptune states it agrees with PPL and Dayton that the costs of transmission facilities needed to address end of life criteria, such as the MTB Project, should be allocated under Schedule 12, section (b)(xiii) of the PJM Tariff.<sup>48</sup>

24. In its answer, PJM states that it has never designated a transmission facility needed solely to address individual transmission owner Form No. 715 local planning criteria as a replacement project or applied Schedule 12, section (b)(xiii) to this type of project. PJM explains that if the Commission agrees that this provision is applicable to transmission facilities needed solely to address individual transmission owner Form No. 715 local planning criteria, PJM would need to make a preliminary determination on whether replacement projects enhance or expand the PJM transmission system more than incidentally.<sup>49</sup>

25. The Industrial Customer Coalition, ODEC and Dominion argue that PPL's and Dayton's assertions that PJM should not have included Dominion's high voltage projects in the RTEP because they are not enhancements to the transmission system are incorrect. They state that the cost allocation provisions under Schedule 12, section (b)(xiii) are consistent with *Old Dominion* and Commission precedent that determined that these provisions do not apply to Required Transmission Enhancements.<sup>50</sup> ODEC and Dominion state the Cost Allocation Compliance Filing correctly includes the Remand Projects in the RTEP as Required Transmission Enhancements in accordance with the Tariff because they are high voltage transmission facilities that address regional reliability violations that clearly enhance PJM's transmission system.<sup>51</sup> Industrial Customer Coalition argues that applying Schedule 12 (b)(xiii) to allocate the costs of transmission facilities needed solely to address a transmission owner zone Form No. 715 planning criteria would produce an impermissible outcome as determined by the Order on Remand, constitutes an untimely request for rehearing of the Order on Remand, and is a

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<sup>47</sup> PPL and Dayton Protest at 22-26. PPL and Dayton state the Order on Remand also did not clarify these issues. PPL and Dayton Answer at, 5-8 (Jan. 2, 2020).

<sup>48</sup> Neptune Answer at 1-4, 6-9 (Dec. 18, 2019).

<sup>49</sup> PJM Answer at 3-5.

<sup>50</sup> Industrial Customer Coalition Answer at 2-4, ODEC and Dominion Answer, at 3-6 (Dec. 18, 2019) (citing Orders on PJM Transmission Owner Tariff Revisions).

<sup>51</sup> *Id.* at 8-12, 16 (Dec. 18, 2019) (citing PJM, Intra-PJM Tariffs, Schedule 12, OATT Schedule 12, 14.0.0, § (b)(iv)); ODEC and Dominion Answer, at 7-8 (Jan. 16, 2020) (citing *Old Dominion*, 898 F.3d at 1262).

collateral attack on the Commission's acceptance that Form No. 715 planning criteria is included in the RTEP planning criteria under the PJM Operating Agreement.<sup>52</sup> AMP refutes PPL and Dayton's characterization of end of life facilities and replacement facilities, arguing that their characterization is inconsistent with the principles of cost causation.<sup>53</sup> AMP states that the replacement of these facilities today is distinct from when PJM's system was created, and provides that PJM's transmission system is planned according to current and future needs.<sup>54</sup> Industrial Customer Coalition explains there is currently a stakeholder process underway in PJM to provide resolution of the issue surrounding transmission projects driven by end of life planning criteria.<sup>55</sup>

26. In response to protests from ODEC, Dominion, and the Industrial Customer Coalition, PPL and Dayton answer that they do not dispute transmission facilities properly included in PJM's RTEP should be subject to the same cost allocation as Replacement Facilities but rather argue transmission facilities that replace asset management facilities should not be considered Required Transmission Enhancements.<sup>56</sup> PPL and Dayton argue it is inconsistent with *Old Dominion* to allocate costs of transmission facilities without quantifying the benefits to other transmission customers, and no such review has occurred here.<sup>57</sup> PPL and Dayton argue that assuming a transmission facility needed to address Form No. 715 planning criteria provides regional benefits only because it is high voltage, as ODEC and Dominion assert, is an argument that the courts have rejected.<sup>58</sup> PPL and Dayton also argue that any cost shifts not based

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<sup>52</sup> Industrial Customer Coalition Answer at 8-9, (citing PJM Operating Agreement, Schedule 6 § 1.2(e)). ODEC and Dominion also argue that disputes over this provision and terms in the Consolidated Transmission Owner Agreement should have been raised on rehearing to the Order on Remand. ODEC and Dominion Answer at 3-5 (Dec. 18, 2019).

<sup>53</sup> AMP Answer at 2-5.

<sup>54</sup> *Id.* at 4-7.

<sup>55</sup> Industrial Customer Coalition Answer at 10.

<sup>56</sup> PPL and Dayton Answer at 3-4 (Jan. 2, 2020).

<sup>57</sup> *Id.* at 13-14 (Jan. 2, 2020).

<sup>58</sup> *Id.* at 9-10 (Jan. 31, 2020) (citing *Ill. Commerce Comm'n v. FERC*, 576 F. 3d 470).

on cost causation principles, even gradual, would be unjust and unreasonable.<sup>59</sup> ODEC and Dominion argue that the Consolidated Transmission Owners Agreement does not apply to facilities that can no longer be maintained, and that PJM has recognized that deteriorating facilities can be replaced with new assets to which regional cost allocation principles apply.<sup>60</sup> In response, PPL and Dayton refute ODEC and Dominion's characterization of requirements under the Consolidated Transmission Owners Agreement, and state the plain language of that agreement requires transmission owners to maintain the functionality of their transmission facilities in the PJM transmission system.<sup>61</sup>

27. Several parties present arguments regarding the applicability of Order No. 890 and Order No. 1000 transmission planning processes to transmission facilities needed solely to address individual transmission owner Form No. 715 local planning criteria, or specifically the Remand Projects.<sup>62</sup> PPL and Dayton argue recent determinations from the Commission related to asset management transmission facilities affirm that these types of facilities do not benefit customers in other transmission owner zones, and should not be subject to Order No. 890 transmission planning.<sup>63</sup> The Illinois Commission argues that the Cost Allocation Compliance Filing contradicts Commission policy under Order No. 1000<sup>64</sup> regarding competitive transmission planning processes for all regional

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<sup>59</sup> PPL and Dayton state that approximately \$60 million will be shifted from the Dominion zone to other transmission owner zones. *Id.*, at 11-12 (Jan. 31, 2020).

<sup>60</sup> *Id.* at 3-5 (Jan. 16, 2020).

<sup>61</sup> *Id.* at 2-4 (Jan. 31, 2020) (citing PJM Interconnection, L.L.C., Consolidated Transmission Owners Agreement, Rate Schedule. No. 42 § 4.5 (June 19, 2008)).

<sup>62</sup> *Preventing Undue Discrimination & Preference in Transmission Serv.*, Order No. 890, 118 FERC ¶ 61,119, *order on reh'g*, Order No. 890-A, 121 FERC ¶ 61,297 (2007), *order on reh'g*, Order No. 890-B, 123 FERC ¶ 61,299 (2008), *order on reh'g*, Order No. 890-C, 126 FERC ¶ 61,228, *order on clarification*, Order No. 890-D, 129 FERC ¶ 61,126 (2009).

<sup>63</sup> PPL and Dayton Protest at 16-17, 19-21, 25 (citing *Southern Cal. Edison Co., et al.*, 164 FERC ¶ 61,160 (2018); *Cal. Pub. Util. Comm'n v. Pac. Gas & Elec. Co.*, 164 FERC ¶ 61,161 (2018) (California Orders)). PPL and Dayton Answer at, 4-5 (Jan. 31, 2020).

<sup>64</sup> *See* Order No. 1000, 136 FERC ¶ 61,051 at P 328 ("the Commission requires each public utility transmission provider to amend its OATT to describe a transparent and not unduly discriminatory process for evaluating whether to select a proposed transmission facility in the regional transmission plan for purposes of cost allocation").

projects that have regional cost allocation. The Illinois Commission argues that because proposal windows cannot be applied retroactively to the 11 Regional Facilities in the Remand Projects, the costs of those projects should not be permitted to be allocated outside of the transmission owner zone whose Form No. 715 local planning criteria drive each project.<sup>65</sup> PPL and Dayton argue transmission projects included in the RTEP solely to address individual transmission owner Form No. 715 local planning criteria are not planned through regional transmission planning criteria, are not planned as a cost effective solution utilizing regional transmission processes established by the PJM transmission owners, and are a type of projects not subject to Order No. 1000.<sup>66</sup> In response, ODEC and Dominion argue that the California Orders are not applicable precedent because they are limited to the issues of those proceedings, do not reverse Commission findings regarding transmission facilities needed solely to address individual transmission owner Form No. 715 local transmission planning criteria, and are related to transmission facilities more limited in scope than the large replacement transmission facilities at issue in this Cost Allocation Compliance Filing.<sup>67</sup>

#### **B. Refunds for Remand Projects**

28. ODEC and Dominion argue that PJM has not complied with the Commission's directive regarding refunds in the Order on Remand because PJM does not clearly explain nor include the Commission's refund obligation in the Cost Allocation Compliance Filing.<sup>68</sup> ODEC and Dominion argue that the Commission directed that "PJM's cost assignment corrections must be in accordance with 18 C.F.R. § 35.19(a),"<sup>69</sup> which points to the Commission's requirement to make refunds with interest. ODEC and Dominion argue PJM is required to not only correct cost responsibility assignments starting May 25, 2015, but also must provide refunds plus interest, that are associated with the corrected cost responsibility assignments. ODEC and Dominion state that the Cost Allocation Compliance Filing does not mention calculating refunds with interest as a result of the revised cost responsibility assignments.<sup>70</sup> Therefore, ODEC and Dominion request that the Commission: 1) reject the Cost Allocation Compliance Filing, and 2) require PJM to submit a further compliance filing that includes a calculation of refunds

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<sup>65</sup> Illinois Commission Protest at 6-7.

<sup>66</sup> PPL and Dayton Protest at 11-14.

<sup>67</sup> ODEC and Dominion Answer at 18-19 (Dec. 18, 2019).

<sup>68</sup> *Id.* at 1-3.

<sup>69</sup> *Id.* at 2 (citing Order on Remand, 168 FERC ¶ 61,133 at n.43).

<sup>70</sup> *Id.* at 3.

plus interest associated with the revised cost responsibility assignments for the transmission projects needed to address Form No. 715 local planning criteria at issue in this proceeding.<sup>71</sup>

29. The Illinois Commission argues that the Commission was silent on refunds in its Order on Remand, and absent an order directing refunds the only impact of the Cost Allocation Compliance Filing is to revise cost responsibility assignments going forward.<sup>72</sup> Linden argues that neither the Order on Remand nor the Commission's regulations have an express directive to require refunds, but rather the Commission has discretion to do so.<sup>73</sup> Linden states that the Commission has declined to order refunds when it determines cost allocation should have been allocated differently but the correct level was collected, which is similar to the cost allocation issues in the Cost Allocation Compliance Filing here.<sup>74</sup>

30. In response, ODEC and Dominion argue that Linden disregards that the Commission has already required refunds, and Linden has not sought rehearing of this directive. ODEC and Dominion argue that Linden's arguments regarding the Sewaren Project provide no new information, and given that *Old Dominion* determined the "unamended tariff remains in effect" all Remand Projects must be reallocated without the 2015 PJM Transmission Owner Tariff Revision.<sup>75</sup> ODEC and Dominion argue that, contrary to Linden's characterization, the Commission has used its broad remedial authority to determine refunds that were appropriate in order to correct cost allocation.<sup>76</sup> ODEC and Dominion argue that in the February 2016 Order, the Commission did not direct payment of refunds, which contrasts to the Commission's directive in Order on

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<sup>71</sup> *Id.* at 4.

<sup>72</sup> Illinois Commission Protest at 7-8.

<sup>73</sup> Linden Answer, at 3 (Dec. 4, 2019) (citing 18 C.F.R. § 35.19a(a)(1) (2019)).

<sup>74</sup> Linden argues requiring refunds would be inconsistent with *Old Dominion* because it would allocate costs of the projects b2276, b2276.1 b2276.2 (Sewaren Project) 100% to Linden despite Linden receiving only 38% of the benefits from that project, which is inconsistent with cost causation principles. *Id.* at 3-5 (citing *La. Pub. Serv. Comm'n v. FERC*, 883 F.3d 929, 932-33 (D.C. Cir. 2018)).

<sup>75</sup> ODEC and Dominion Answer at 4 (Dec. 19, 2019) (citing *Old Dominion*, 905 F.3d at 671).

<sup>76</sup> *Id.* at 4-5 (Dec. 19, 2019) (citing *Black Oak Energy, LLC*, 167 FERC ¶ 61,250, at P 27 (2019)).



Remand.<sup>77</sup> In a limited answer to ODEC and Dominion, Linden argues that ODEC and Dominion do not point to an explicit directive to order refunds.<sup>78</sup>

## **VI. Determination**

### **A. Procedural Matters**

31. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2019), the notice of intervention and timely, unopposed motions to intervene serve to make the entities that filed them parties to the proceeding.

32. Pursuant to Rule 214(d) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214(d) (2019), we grant the Industrial Customer Coalition late-filed motion to intervene given its interest in the proceeding, the early stage of the proceeding, and the absences of undue prejudice or delay.

33. Rule 213(a)(2) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.217(a)(2) (2019), prohibits an answer to a protest unless otherwise ordered by the decisional authority. We accept the answers because they have provided information that assisted us in our decision-making process.

### **B. Substantive Matters**

#### **1. Schedule 12 Compliance Filing**

34. We accept the PJM Transmission Owners' proposal to replace the 2015 PJM Transmission Owner Tariff Revision with a revision to Schedule 12, section (b)(xv) as "Reserved," effective May 25, 2015. However, this Tariff record does not correctly remove the 2015 PJM Transmission Owner Tariff Revision in Schedule 12, section (b)(xv) from superseded versions. Accordingly, we direct PJM Transmission Owners to revise and refile each subsequent version of Tariff records going forward, starting from the records accepted after May 25, 2015.<sup>79</sup>

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<sup>77</sup> *Id.* at 6 (Dec. 19, 2019) (citing February 2016 Order, 154 FERC ¶ 61,096).

<sup>78</sup> Linden Answer at 3-4 (Jan. 3, 2020) (citing Request for Clarification or, in the Alternative, Rehearing of ODEC and Dominion, Docket No. ER15-1387-004, et al. (filed Sept. 23, 2019)).

<sup>79</sup> The PJM Transmission Owners acknowledge that the revisions in the Schedule 12 Compliance Filing have been superseded and commit to work with PJM to submit requisite "clean up" filings once the Commission issues an order on this compliance filing. PJM Transmission Owners Transmittal, at 2, n.2 (Sept. 27, 2019).

## 2. Cost Allocation Compliance Filing

35. As we explain below, we accept PJM's Cost Allocation Compliance Filing.

### a. Metuchen-Trenton-Burlington Project and Front Street-Springfield Project

36. Neptune and LIPA argue that the cost allocation for the MTB Project and the Springfield Project results in cost responsibility assignments that are not commensurate with the benefits Neptune receives from these projects, and that PJM has not determined that either project addresses a reliability contingency. Neptune and LIPA also raise arguments that the *de minimis* threshold is unjust and unreasonable.

37. The only issue in this proceeding is whether the Cost Allocation Compliance Filing makes the corrections to the PJM Tariff necessary to reflect the rejection of the 2015 PJM Transmission Owner Tariff Revision. Therefore, we find that arguments regarding the just and reasonableness of the solution-based DFAX method and the *de minimis* threshold are beyond the scope of this compliance proceeding. We find that PJM has complied with the directive of the Order on Remand, and applied the cost responsibility assignments for the Remand Projects pursuant to its currently-effective just and reasonable Tariff.<sup>80</sup>

### b. Other Remand Projects

38. Protestors raise a variety of arguments regarding the regional cost allocation for transmission facilities included in RTEP to address Form No. 715 local planning criteria. We reject these arguments. As noted above, the Cost Allocation Compliance Filing addresses the reallocation of costs for the Remand Projects as directed in the Order on Remand under PJM's existing cost allocation method, not how the projects are planned or whether different cost allocation provisions under Schedule 12 should be applied to the Remand Projects. We reiterate that PJM has followed the directives of the Order on Remand and has adhered to the correct Schedule 12 provisions to reallocate the costs of the Remand Projects.

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<sup>80</sup> The Commission has determined that because the solution-based DFAX methodology is the *ex ante* methodology for determining cost allocation in the PJM transmission planning process, PJM's cost responsibility assignment filings need only demonstrate that the cost responsibility assignments comply with the PJM Tariff and do not "require[] a separate justification under section 205." *See Linden VFT, LLC*, 170 FERC ¶ 61,122, at PP 43-45, 69 (2020); *see also PJM Interconnection, L.L.C.*, 165 FERC ¶ 61,078, at P 20 (2018).

39. The Order on Remand addressed arguments related to whether the transmission facilities needed solely to address individual transmission owner Form No. 715 local planning criteria provide regional benefits to other transmission zones and determined that there was no basis to distinguish beneficiaries of these projects from other projects included in the RTEP.<sup>81</sup> The Order on Remand also concluded that the 2015 PJM Transmission Owner Tariff Revision, as a FPA section 205 filing, needed to be rejected in its entirety, and thus would no longer apply to all transmission facilities that are needed solely to address individual transmission owner Form No. 715 local planning criteria.<sup>82</sup> Arguments that the 2015 PJM Transmission Owner Tariff Revision should not have been rejected in its entirety are beyond the scope of this compliance filing.<sup>83</sup>

40. We are not persuaded by arguments that the Remand Projects should be treated as replacement projects pursuant to Schedule 12, section (b)(xiii). Schedule 12, section (b)(xiii) provides that “[u]nless determined by PJM to be a Required Transmission Enhancement included in a Regional Transmission Expansion Plan, cost responsibility for the replacement of Transmission Facilities, as defined in Consolidated Transmission Owners Agreement, section 1.27, shall be assigned to the Zonal loads and Merchant Transmission Facilities responsible for the costs of the Transmission Facilities being replaced.”<sup>84</sup> The Remand Projects are included in the RTEP as Required Transmission Enhancements, and therefore the costs of Remand Projects are not replacement projects pursuant to Schedule 12, section (b)(xiii).

41. We deny the Illinois Commission’s protest of the regional cost allocation for projects included in the RTEP that were exempt from the competitive procurement window process. While the Commission, as a result of the Order on Remand, required PJM to revise the PJM Operating Agreement to reestablish the competitive window procurement process, transmission projects included in the RTEP during the period in which the Commission committed legal error were exempted from a competitive window procurement process under the then-applicable Tariff. The Order on Remand directed the reassignment of cost responsibility, and PJM in this proceeding has complied with that directive.

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<sup>81</sup> Order on Remand, 168 FERC ¶ 61,133 at PP 24-27.

<sup>82</sup> *Id.* at P 27.

<sup>83</sup> Concurrent with this order, the Commission is rejecting arguments on rehearing to the Order on Remand. *See PJM Interconnection, L.L.C.*, 171 FERC ¶ 61,012 (2020).

<sup>84</sup> PJM, Intra-PJM Tariffs, Schedule 12, OATT Schedule 12, 14.0.0, § (b)(xiii).

### 3. Refunds

42. ODEC and Dominion argue PJM did not comply with the refund directive in the Order on Remand because PJM does not explain, and therefore seemingly excludes, that directive in the Cost Allocation Compliance Filing. The Illinois Commission argues that costs should only apply going forward, and Linden argues the Order on Remand did not require refunds. In an order on rehearing being issued concurrently with this order, the Commission finds that the Order on Remand requires PJM to rebill with interest.<sup>85</sup>

#### The Commission orders:

(A) The PJM Cost Allocation Compliance Filing is accepted to be effective May 25, 2015, as discussed in body of this order.

(B) The PJM Transmission Owners' Schedule 12 Compliance Filing is accepted, as discussed in the body of this order.

(C) The PJM Transmission Owners are directed, within 60 days of the date of this order, to make a filing in eTariff to make all Schedule 12 Tariff corrections necessary to reflect the rejection of the 2015 PJM Transmission Owners Tariff Revision that have been superseded, as discussed in the body of this order.

By the Commission. Commissioner Danly is not participating.

( S E A L )

Nathaniel J. Davis, Sr.,  
Deputy Secretary.

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<sup>85</sup> *PJM Interconnection, L.L.C.*, 171 FERC ¶ 61,012 (denying rehearing and granting clarification).

## **Appendix**

PJM Interconnection, L.L.C.  
Intra-PJM Tariffs

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 3.1.4](#) Effective 5/25/2015

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 3.3.0](#) Effective 1/1/2016

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 7.2.2](#) Effective 2/16/2016

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 7.4.0](#) Effective 4/14/2016

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 8.4.0](#) Effective 4/25/2016

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 9.2.0](#) Effective 11/30/2016

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 9.3.0](#) Effective 1/1/2017

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 10.2.0](#) Effective 2/15/2017

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 11.2.0](#) Effective 4/6/2017

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 12.2.0](#) Effective 5/1/2017

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 13.2.0](#) Effective 6/15/2017

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 14.2.0](#) Effective 10/10/2017

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 15.1.0](#) Effective 11/23/2017

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 15.1.4](#) Effective 1/1/2018

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 16.2.0](#) Effective 2/15/2018

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 17.1.0](#) Effective 4/5/2018

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 18.1.0](#) Effective 6/14/2018

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 19.1.0](#) Effective 8/9/2018

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 20.1.0](#) Effective 11/28/2018

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 20.1.2](#) Effective 1/1/2019

[SCHEDULE 12.APPX A - 12, OATT SCHEDULE 12.APPENDIX A - 12 Public Service Electric and, 21.2.0](#) Effective 1/31/2019

[SCHEDULE 12.APPX A - 20, OATT SCHEDULE 12.APPENDIX A - 20 Virginia Electric and Power, 6.5.0](#) Effective 2/16/2016

[SCHEDULE 12.APPX A - 20, OATT SCHEDULE 12.APPENDIX A - 20 Virginia Electric and Power, 7.5.0](#) Effective 4/14/2016

[SCHEDULE 12.APPX A - 20, OATT SCHEDULE 12.APPENDIX A - 20 Virginia Electric and Power, 8.3.0](#) Effective 6/16/2016

[SCHEDULE 12.APPX A - 20, OATT SCHEDULE 12.APPENDIX A - 20 Virginia Electric and Power, 9.3.0](#) Effective 11/30/2016

[SCHEDULE 12.APPX A - 20, OATT SCHEDULE 12.APPENDIX A - 20 Virginia Electric and Power, 10.2.0](#) Effective 1/1/2017

[SCHEDULE 12.APPX A - 20, OATT SCHEDULE 12.APPENDIX A - 20 Virginia Electric and Power, 11.2.0](#) Effective 4/6/2017

[SCHEDULE 12.APPX A - 20, OATT SCHEDULE 12.APPENDIX A - 20 Virginia Electric and Power, 12.3.0](#) Effective 5/1/2017

[SCHEDULE 12.APPX A - 20, OATT SCHEDULE 12.APPENDIX A - 20 Virginia Electric and Power, 13.2.0](#) Effective 6/15/2017